SOLUTIA

Solutions for a better life.

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November 10, 2003

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Area 2 Site – October 3, 2002 Unilateral Administrative Order (UAO) Groundwater Operable Unit
 # 12 - Monthly Report; October 1 – October 31, 2003 Reporting Period

Dear Mr. Fayoumi,

Attached is the Monthly Report for the Sauget Area 2 Site October 3, 2002 Unilateral Administrative Order (UAO) - Groundwater Operable Unit. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section XII, paragraph 62, Progress Reports. This report is for the October 1 – October 31 reporting period.

Sincerely,
Solutia Inc.

Gary Vandiver
Project Coordinator
Solutia Inc.

cc: Bardo, Ken - U. S. EPA
Sandra Bron – IEPA
Richard Williams – Solutia
Cathleen Bumb – Solutia
Mayor Frank Bergman – Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor P. Sauget - Sauget, IL
Mike Coffey - U. S. Fish & Wildlife Service
Linda Tape – Husch & Eppenberger

Sauget Area 2 Site - Sauget, Illinois

October 3, 2002 UAO – Groundwater Operable Unit

Monthly Report

Date of Report: November 10, 2003
Period Covered: October 1, 2003 - October 31, 2003

Agency Actions / Communications

In an e-mail message dated June 19, 2003, U. S. EPA requested the submission of revised versions of the Focused Feasibility Study, the Remedial Design Work Plan, and the Pre-Final (95%) Remedial Design. The revisions were required to allow the use of a slurry wall rather than jet grouting for construction of the barrier wall. The revised documents were submitted on July 3, 2003. The ESD was issued by US EPA on July 30, 2003.

Work Performed During the Reporting Period

Slurry Wall

Inquip is at least 3 weeks behind schedule assuming that productivity will increase to their estimate of 40 feet per day. So far they are averaging much less. The major causes of delay have been rocks and boulders, equipment break downs and rain. Arrangements are being made to begin a two shift operation by November 17. This requires securing additional operators for the clamshells.

The stabilization work was completed in October. The key part of the solution was to add a minimum of a 2 foot high working platform and raise the slurry level by ~3 feet. Also wick drains were installed on the inside of the trench (landfill side) The wick drains will drain the perched water from the soft soils and provide a firm foundation

INQUIP continued to excavate the barrier wall with the Koehring 1266 and both Liebherr clamshell rigs. INQUIP excavated the barrier wall trench south of the clamshell locations with the Koehring 1266 to 80ft. plus in depth. The barrier wall excavation was observed to be 80ft plus in depth to approximately station 20+00. The clamshell rigs have excavated to rock (+/-133ft.) from station 26+20 south to approximately station 21+40. INQUIP maintained a constant slurry level within the trench excavation by pumping fresh slurry into the trench from the south slurry holding pond as needed. INQUIP tested fresh slurry and trench slurry properties throughout each day as required. INQUIP recorded test results on daily field material testing logs.

INQUIP continued mixing and placing batches of backfill consisting of previously excavated spoils and 3% bulk bentonite into the excavation at the beginning of the lead in trench. The clamshell re-cleaned the trench bottom ahead of the backfill toe prior to the placement of backfill. INQUIP continued to take measurements of the barrier wall excavation bottom to demonstrate that the bottom is clean of sediment and ready for backfill placement. INQUIP performed measurements using a weighted down rigger and readings from the clamshell as the clam re-cleaned the bottom of the excavation (top of rock) prior to placing backfill. After cleaning the excavation bottom and prior to placing backfill, INQUIP sampled the in-place trench backfill for sediment using a small clamshell sampler. INQUIP was able to collect a sample with the clam sampler after several attempts at each location. INQUIP performed onsite testing of the backfill material, and also collected samples for testing the backfill material at an offsite lab. INQUIP recorded test results on daily field material testing logs.

INQUIP changed specifications for measuring and cleaning the trench bottom in October. The original method of measurement was not adequate. A new specification was drafted by their design engineer but had not been submitted at months end. Oversight contractor CH2MHill has monitored bottom cleaning and agreed that it is acceptable. The spec will be submitted as soon as received from Inquip.

Pangea placed additional geonet as a marker fabric in the west portion of the temporary spoils stockpile in preparation for stockpiling barrier wall excavation spoils. INQUIP continued hauling and stockpiling barrier wall excavation spoils in the northeast quadrant of the stockpile area.

Pangea completed placing the rubber plate gasket, grouting the plate, and mounting the 6" gate valves on the two flanges through the bulkhead plate @ the 54" box culvert outfall this week. Final requirements for the box culvert continue to be discussed with the Agencies.

Groundwater Pilot Test

The report for the groundwater pilot test is being prepared by the Advent Group. It will be submitted early in November.

Groundwater Treatment

The Sauget Area 2 Groundwater Migration Control System pumped at 1000 gpm for the first three weeks of October. The flow was increased on October 22 to match the lookup table based on river level. The system pumped at ~ 1750 gpm for the remainder of the month.

Effluent pumping data for each well is attached. The variation noted on the monthly flow charts is due to interference in the control system. URS, the O&M contractor for this system is working to resolve the problem.

Schedule

Inquip is at least 3 weeks behind schedule assuming that productivity will increase to their estimate of 40 feet per day. So far they are averaging much less. The major causes of delay have been rocks and boulders, equipment break downs and rain. Arrangements are being made to begin a two shift operation by November 17. This requires securing additional operators for the clamshells.

Submittals in October

Fly Ash Information, October 3, 2003

Project Plans, October 14, 2003

- The contractor's Project Health and Safety Plan
- The Construction and Quality Control Plan
- The Hydraulic Barrier Plan.
- The Stormwater Pollution Prevention Plan

Trench Excavation Stability Design, October 16, 2003

Tech Memo - Slurry Wall Changes, October 20, 2003

Tech Memo - Box Culvert Options, October 24, 2003

Tech Memo - Slurry Wall Spoils Generation, October 24, 2003

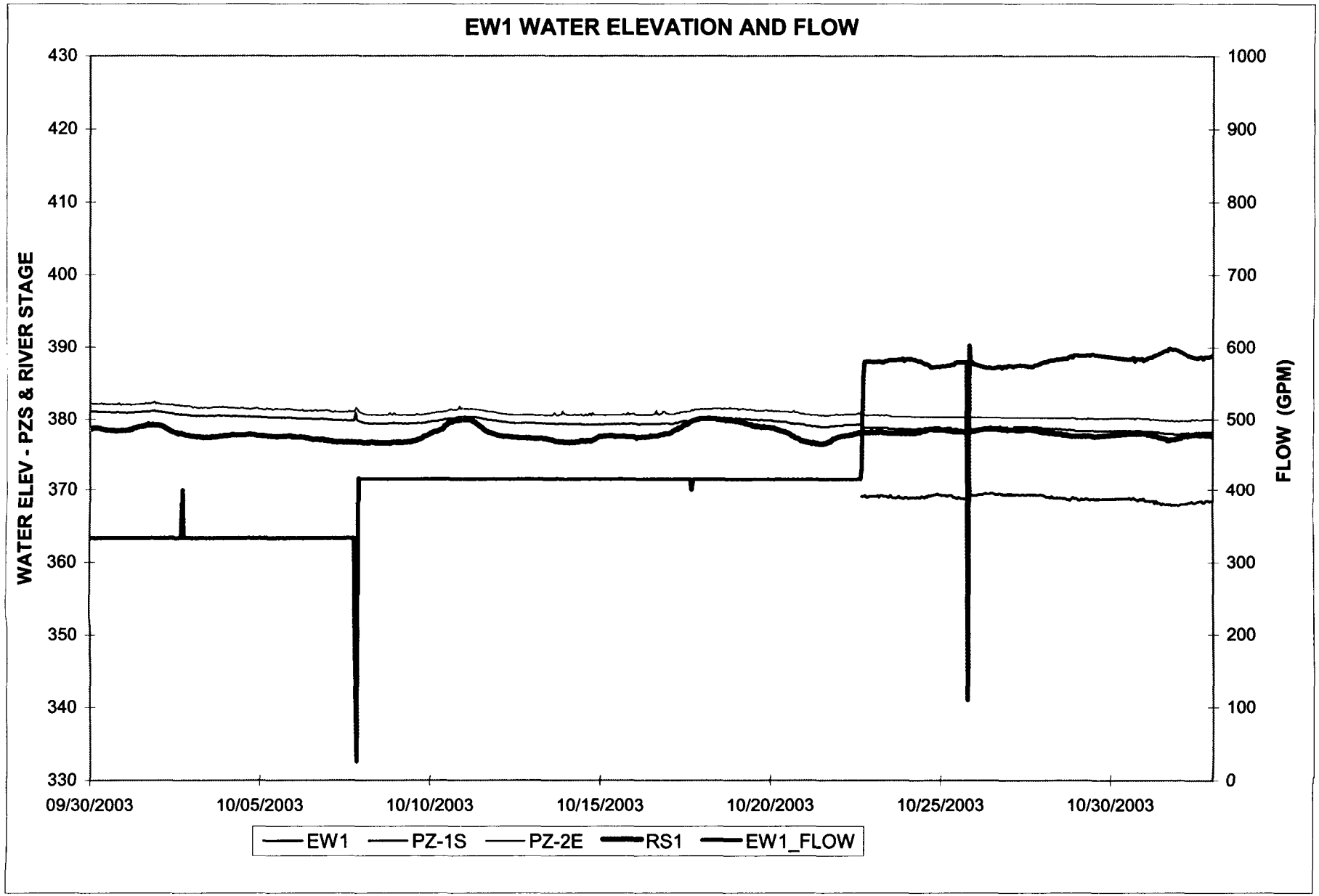
Work scheduled for next reporting period

Continue trenching activities for the slurry wall.

Continue pumping and treating groundwater per the lookup table based on river level..

BCC: (via e-mail only)

C. Bumb
B. Yare - 1S
L. Tape – Husch & Eppenberger, LLC
J. Lebold – 1740
M. Peal
S. Wendler - 3S
D. Ridenhower - 1740
A. Faust - 3N
R. Williams – Williams & Associates


EW1 WATER ELEVATION AND FLOW
WATER ELEV - PZS & RIVER STAGE
FLOW (GPM)
430
420
410
400
390
380
370
360
350
340
330
1000
900
800
700
600
500
400
300
200
100
0
09/30/2003
10/05/2003
10/10/2003
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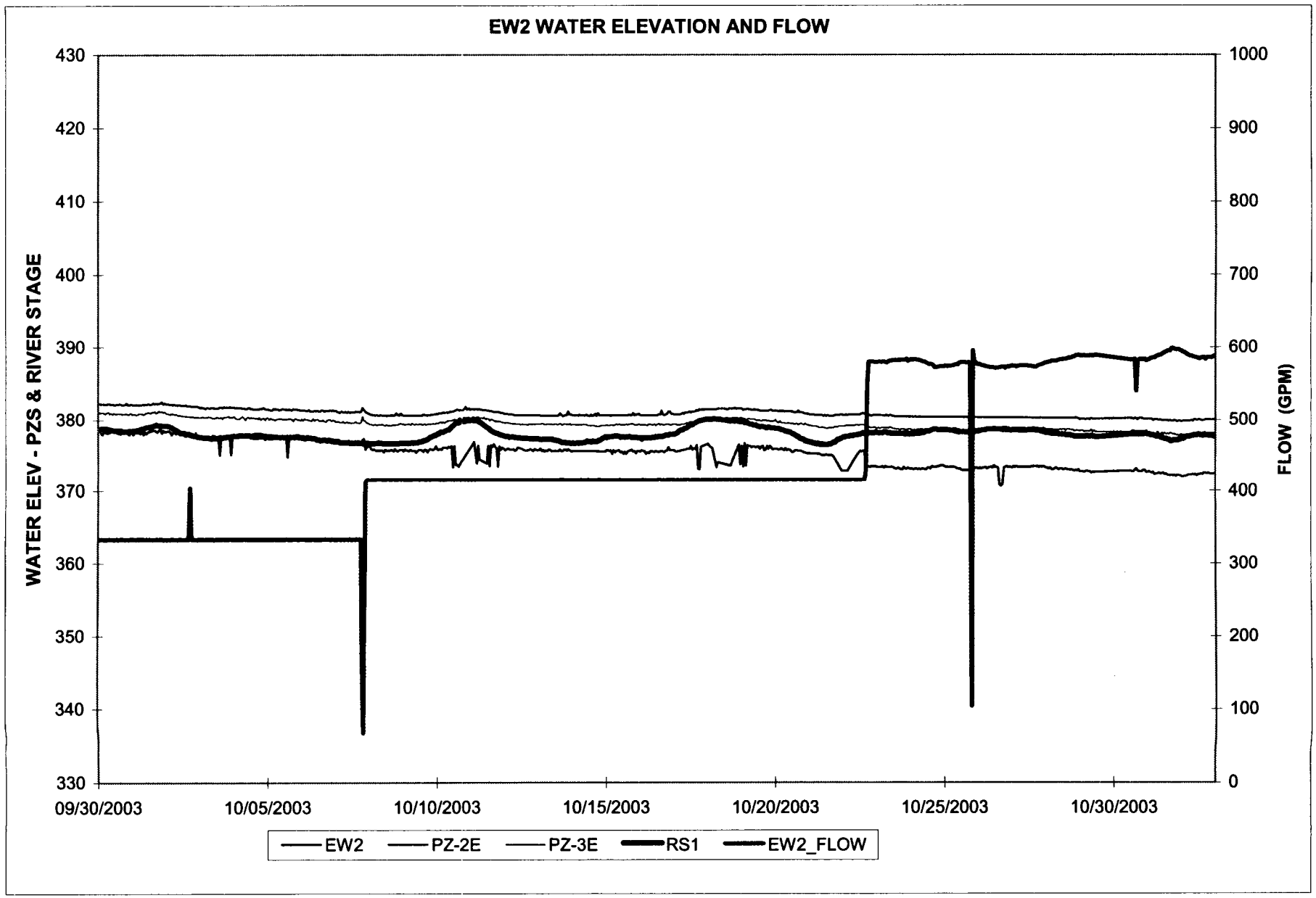
10/25/2003
10/30/2003
EW1
PZ-1S
PZ-2E
RS1
EW1_FLOW


EW2 WATER ELEVATION AND FLOW
WATER ELEV - PZS & RIVER STAGE
FLOW (GPM)
430
420
410
400
390
380
370
360
350
340
330
1000
900
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700
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10/10/2003
10/15/2003
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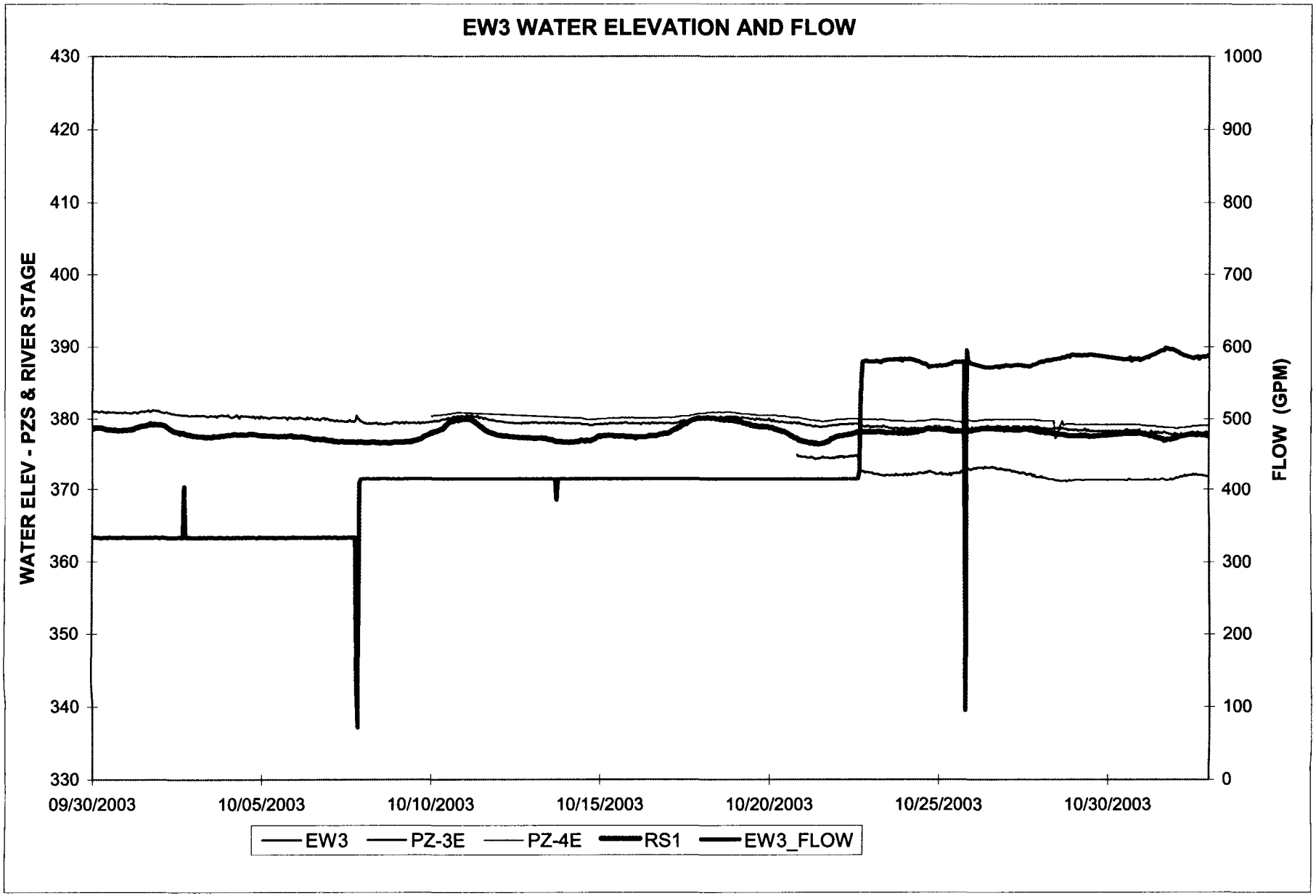
10/25/2003
10/30/2003
EW2
PZ-2E
PZ-3E
RS1
EW2_FLOW


EW3 WATER ELEVATION AND FLOW
WATER ELEV - PZS & RIVER STAGE
FLOW (GPM)
430
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360
350
340
330
1000
900
800
700
600
500
400
300
200
100
0
09/30/2003
10/05/2003
10/10/2003
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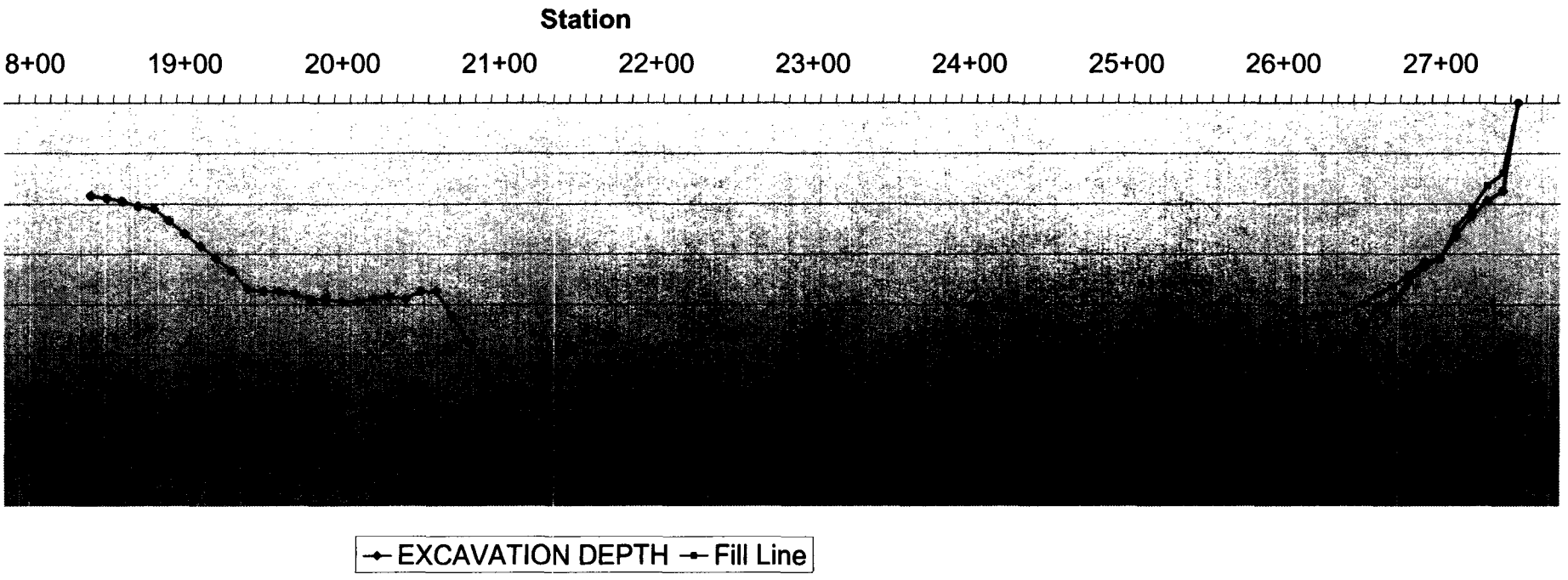
10/25/2003
10/30/2003
EW3
PZ-3E
PZ-4E
RS1
EW3_FLOW


Station
8+00
19+00
20+00
21+00
22+00
23+00
24+00
25+00
26+00
27+00
EXCAVATION DEPTH
Fill Line